

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MOTION TO CONTINUE SENTENCING HEARING

The government and defendant hereby respectfully consent and request, by and through Assistant United States Attorney Paul R. Moore and Mr. Morello's counsel, Michael F. Natola, that the Court continue the Sentencing Hearing in this matter from February 28, 2006, to a date at least sixty (60) days thereafter, in accordance with the expressed need of the United States Probation Office to have additional time in which to complete the Pre-Sentence Report and to accommodate the need of the parties to examine and respond to the Pre-Sentence Report.

It is the understanding of the government and the defendant that the Probation Office needs additional time, for various reasons, to properly complete its Report. The parties consent to the request of the Probation Office that it have an additional time in which to prepare the Report and during which extension of the Sentencing Hearing (at least sixty (60) days) the parties will have the opportunity to examine the Report and respond to its findings.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

/s/ Paul R. Moore
Paul R. Moore
Assistant U.S. Attorney

STEVEN MORELLO
Defendant

By:

/s/ Michael F. Natola
Michael F. Natola
Counsel for Mr. Morello

January 19, 2006